

**DEPARTMENT OF WATER RESOURCES**

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February 27, 2012

To: Agency Reviewers of Administrative Draft BDCP (Working Draft)

The California Department of Water Resources (DWR) greatly appreciates your dedication to the Bay Delta Conservation Plan (BDCP) and your commitment to review this administrative draft of the BDCP. Table 1 below shows the status of each chapter in the administrative draft relative to the last version reviewed by the fish and wildlife agencies. The table identifies the major changes that have been made since the last version seen by the agencies as well as changes that could not be made by this version. We will shortly provide track changes versions of the chapters that you have seen before, along with the disposition tables with our responses to your comments.

The administrative draft is the first time you have seen Chapter 5, *Effects Analysis* and Chapter 8, *Cost and Funding Sources*. The working draft of Chapter 5 contains the "net effects" analysis. Please keep in mind that this analysis evaluates one alternative, the preliminary proposal (PP), which is the same as Alternative 1A in the EIR/EIS. Appendix 5.J of Chapter 5 includes a comparative analysis between the PP and "Scenario 6", which is the same as Alternative 2A in the EIR/EIS, but does not include a separate "stand alone" effects analysis of the Scenario 6 alternative.

We believe that the effects analysis provides substantial information which can be used to further refine the PP into a proposed project for the BDCP that can serve as the basis for the formal application to the fish and wildlife agencies for permits under the federal Endangered Species Act (ESA) and Natural Community Conservation and Planning Act (NCCPA). The effects analysis demonstrates the benefits of the conservation strategy as well as some species-specific adverse side-effects. For almost all covered species, we believe that the adverse effects are more than offset by the benefits of BDCP, and that the project will therefore meet or exceed the standards of a habitat conservation plan (HCP) and natural community conservation plan (NCCP). However, we believe that the effects analysis also suggests that, for a limited number of covered species, the PP may not adequately offset the adverse effects and provide for their conservation. DWR and our consultants are working to identify and evaluate changes to the PP that will offset those adverse effects, provide greater benefits to the covered species, and ensure that the BDCP meets ESA and NCCPA standards for all covered species.

We look forward to your comments on this working administrative draft of the BDCP. We also invite your participation in collaborative discussions in March and April to further improve key components of the conservation strategy. DWR will likely propose changes to the PP during the review period for this administrative draft and request your feedback on those changes. Because of the importance of this task, we ask that you place a higher priority on preparing for and participating in those discussions rather than reviewing the document. Because some components of the plan will change in response to these modifications to the PP, it may be a better use of your time to initially review some chapters quickly for purposes of preparing for participation in the workshops, rather than conduct an initial detailed review of each chapter. To best support these on-going discussions, we recommend that you first review Chapter 3 (Conservation Strategy) and Chapter 5 (Effects Analysis), along with the relevant technical appendices that accompany Chapter 5.

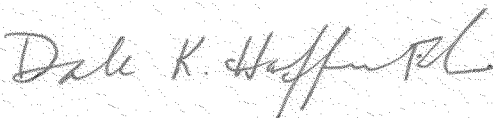
To accommodate your review and your participation in these discussions, we propose the following review process and revised deadlines (Table 2). We ask that your review of chapters take one of two forms:

**High-Level Comments.** High-level conceptual comments in narrative form on matters such as difficulty in understanding information, key missing information, fundamental concerns with methods, or unclear or unsubstantiated conclusions. These comments would be similar to the “summary comments” provided as narratives to many of the Effects Analysis appendices.

**Detailed Comments.** Detailed written comments, in comment tables as has been provided to date on all working drafts.

If you have any questions or immediate concerns, please contact Deputy Director Dale Hoffman-Floerke at (916) 653-8045 or via email at [dalehf@water.ca.gov](mailto:dalehf@water.ca.gov)

Sincerely,



for Mark W. Cowin  
Director

**Table 1. Status of BDCP Chapters as of February 27, 2012**

<b>Chapter</b>	<b>Last Version to Agencies</b>	<b>Comments Received</b>	<b>Changes that will be made after Feb. 27</b>
1: Introduction	1/9/12	State and Feds (1/21/12)	Address new agency comments
2: Existing Conditions	10/9/11	State and Feds (10/6/11)	Address new agency comments
3: Conservation Strategy	Many (in pieces)	Various dates	Address new agency comments Propose adaptive limits for water operations (CM1) Further revisions to conservation strategy to address issues identified in effects analysis Propose actions taken under monitoring, adaptive management and research program
4: Covered Activities	11/7/11	State (11/21/11) Feds (1/26/12)	Address new agency comments
5: Effects Analysis	New	N/A	Address new agency comments Resolve entrainment methods relative to south Delta and complete impingement analysis for north Delta Incorporate revised Delta Passage Model results and fry growth analysis Work with agencies to address comments on Delta smelt and salmonid Habitat Suitability Index analyses and update food analysis Further analyses of corbula, corbicula, microcystis Incorporate results of revised OBAN and IOS models, include sensitivity analyses for Maunder-Deriso, and explore application of additional life cycle models Provide climate change appendix Update critical habitat assessment Update Essential Fish Habitat assessment
6: Implementation	11/2/11	State (11/15/11)	Address new agency comments
7: Implementation Structure	7/15/11	None	Address new agency comments
8: Cost and Funding	New	N/A	Address new agency comments Continue to verify potential funding sources and assumptions for support of BDCP Update 2012 Water Bond as it changes
9: Alternatives to Take	11/18/11	State (12/14/11) Feds (1/6/12)	Address new agency comments Complete analysis of alternatives to take based in part on completed EIR/EIS analysis of alternatives for the covered fish and wildlife species
10: Science Review	10/14/11	State (10/19/11) Feds (1/6/12)	Address new agency comments Describe Delta Science Panel review (in process)

**Table 2. Suggested Agency Review Schedule, by Chapter**

<b>Chapter</b>	<b>Review Priority</b>	<b>Comment Type Requested</b>	<b>Comment Deadline</b>
3: Conservation Strategy	Highest	High-level comments	March 30
5: Effects Analysis	Highest	High-level comments	March 30
7: Implementation Structure	High	High-level and detailed comments	April 16
8: Cost and Funding	High	High-level and detailed comments	April 16
1: Introduction	Moderate	Detailed comments	April 30
2: Existing Conditions	Moderate	Detailed comments	April 30
4: Covered Activities	Moderate	Detailed comments	April 30
6: Implementation	Moderate	Detailed comments	April 30
9: Alternatives to Take	Moderate	Detailed comments	April 30
10: Science Review	Moderate	Detailed comments	April 30